

From: Jamie Felsen
Sent: Friday, February 19, 2021 2:29 PM
To: Fitzgerald, Maureen P.
Cc: Slimm, John L.; Emanuel Kataev; Jeremy Koufakis
Subject: RE: Star Auto Sales, et al. v. Voynow, et al.

Maureen,

We will respond to your letter shortly; however, I wanted to briefly raise one issue. With regard to Plaintiffs' request that Defendants identify those Voynow employees who ever visited Plaintiffs' dealerships to perform accounting work and/or ever worked on Plaintiffs' files, under FRCP 26, Defendants were required to identify all of these individuals in their initial disclosures. Therefore, please amend Defendants' initial disclosures to include all other individuals not already identified who visited Plaintiffs' dealerships to perform accounting work and/or ever worked on Plaintiffs' files. Please also provide their last known addresses and phone numbers.

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From: Smith, Lumi H. <LHSmith@MDWCG.com> **On Behalf Of** Fitzgerald, Maureen P.
Sent: Friday, February 19, 2021 2:09 PM
To: Jamie Felsen <jamiefelsen@mlaborlaw.com>
Cc: Slimm, John L. <JLSlimm@MDWCG.com>
Subject: Re: Star Auto Sales, et al. v. Voynow, et al.

Please see attached.